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ATTORNEYS FOR DANBURY PARTNERS, LTD.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	
SPORTS ONE SUPERSTORES CORP.	§	CASE NO. 22-30085-sgj
And	§	
TEXAS HOLDINGS FIRM CORP.	§	CHAPTER 11
	§	
	§	
Debtors	§	Jointly Administered

**MOTION OF DANBURY PARTNERS, LTD. TO COMPEL
TO ENFORCE SETTLEMENT AGREEMENT**

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT Earle Cabell Federal Building, 1100 Commerce, Room 1254, Dallas, Texas 75242-1496 BEFORE CLOSE OF BUSINESS ON April 22, 2022, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Danbury Partners, Ltd. (“Danbury”) and files this Motion to Enforce and would show as follows:

1. On March 14, 2022, counsel for Danbury and the Debtors in this case appeared before this Court and announced a comprehensive settlement agreement concerning several pending matters. A transcription of the announcement is attached as Exhibit “A”.
2. Subsequent to the announcement the Debtors purported to “withdraw” from the announced agreement based on an alleged breach by Danbury. Danbury denies that it breached the agreement in any way. However, even if there was a breach the appropriate response by Debtors would be enforce the agreement as a contract, not to simply renounce it.¹
3. The form of order attached as Exhibit “B” accurately states the agreement of the parties and the agreement announced in court. This Court should sign the attached form of order. Thereafter, the order can be enforced by this Court as appropriate.

WHEREFORE, PREMISES CONSIDERED, Danbury Partners, Ltd. prays that this Court sign the form of order attached hereto (or any other order necessary to enforce the agreement announced to the court) and for such other and further relief to which Danbury may show itself justly entitled.

¹ See *Guidry v. Halliburton Geophysical Services, Inc.*, 976 F.2d 938 (5th Cir. 1992) and *Rosso v. Foodsales, Inc.*, 55 F. Supp. 274 (E.D. Pa. 1980) for examples of enforcement of announced settlement agreements.

Respectfully submitted.

/s/ Robert M. Nicoud, Jr.

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ATTORNEYS FOR DANBURY PARTNERS,
LTD.

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April 2022, a true and correct copy of the foregoing document was sent via electronic means or by first class mail, postage prepaid to the persons shown below:

Brandon J. Tittle

TITTLE LAW GROUP, PLLC

5550 Granite Pkwy, Suite 220

Plano, Texas 75024

Asher Bublick, Trial Attorney

Office of the U.S. Trustee, Region 6

1100 Commerce Street, Room 976

Dallas, Texas 75242-1496

All parties receiving notice via ECF

/s/ Robert M. Nicoud, Jr.

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